

From: Marta Beckwith <marta@techsealaw.com>
Sent: Tuesday, February 16, 2021 10:49 AM

To: Sheasby, Jason

Cc: Kremer, Paul J.; Curtis, Nathan R.; Kelsey Atkinson; Dominguez, Kate; Hershkowitz, Benjamin; Krevitt,

Josh; melissa@gillamsmithlaw.com; Michael Song; Enoch Liang; ~Bunt, Robert; ~Attaway, Deana;

Matthew Hawkinson; Steve Chang; Dat Nguyen; *** TMUS-Kaifi_C

Subject: RE: Kaifi v. T-Mobile:

[External Email]

All – Subject to its objections, Cisco anticipates producing documents sometime next week that it has located after a reasonable investigation in response to the subpoena.

Marta

From: Sheasby, Jason <JSheasby@irell.com>
Sent: Wednesday, February 10, 2021 10:27 AM
To: Marta Beckwith <marta@techsealaw.com>

Cc: Kremer, Paul J. <PKremer@gibsondunn.com>; Curtis, Nathan R. <NCurtis@gibsondunn.com>; Kelsey Atkinson <kelsey.atkinson@ltlattorneys.com>; Dominguez, Kate <KDominguez@gibsondunn.com>; Hershkowitz, Benjamin <BHershkowitz@gibsondunn.com>; Krevitt, Josh <JKrevitt@gibsondunn.com>; ~Smith, Melissa <melissa@gillamsmithlaw.com>; Michael Song <michael.song@ltlattorneys.com>; Enoch Liang <Enoch.Liang@ltlattorneys.com>; ~Bunt, Robert <rcbunt@pbatyler.com>; ~Attaway, Deana <dattaway@pbatyler.com>;

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Matthew Hawkinson <mhawkinson@hycounsel.com>; Steve Chang <steve.chang@ltlattorneys.com>; Dat Nguyen
<dat.nguyen@ltlattorneys.com>; *** TMUS-Kaifi_C <TMUS-Kaifi_C@gibsondunn.com>

Subject: Re: Kaifi v. T-Mobile:

Marta.

We await your response by Monday.

Best

JS

On Feb 10, 2021, at 10:22 AM, Marta Beckwith <marta@techsealaw.com> wrote:

Jason – Your email misrepresents what has occurred. Here is what actually happened.

Kaifi served the subpoena on Cisco on December 30, 2020. It appeared to us from the subpoena that Kaifi failed to do sufficient diligence before serving the subpoena on Cisco. In any event, the subpoena was overly broad and incredibly burdensome because of that. Cisco served its objections and responses to the subpoena on January 13, 2021. I will not reiterate Cisco's objections here but they were voluminous because of the breadth of the subpoena. Nonetheless, Cisco agreed to meet and confer with Kaifi about the requests. The meet and confer originally was scheduled for January 19 but I had a conflict come up and it instead took place on January 21.

Kaifi had three lawyers present during that meet and confer: Chris Bunt who served the subpoena and two others, Dat Nguyen and Mike Song. You were not on that call. Nonetheless, later that same day, you emailed a large set of people stating that "Cisco's counsel needs permission to produce T-Mobile confidential information." That was not true. I never said on the meet and confer call that Cisco needed T-Mobile's authorization. Instead, I said on the call that Cisco might

need such authorization for some information depending on what information was identified during Cisco's investigation. In addition, in response to your email, I directly informed you that Cisco had not identified any such information as of that date. To be clear, as of today, Cisco has still not identified any documents responsive to the subpoena for which it needs T-Mobile's authorization to produce. So, your statement in today's email that Cisco refused to produce information without T-Mobile's permission is simply wrong.

Going back to the meet and confer for which you were not present, despite Kaifi having three lawyers present on the call, apparently none of them took any notes of what was agreed. During the call, I requested additional information from Kaifi in order to reduce the burden on Cisco of the investigation. Although the lawyers on the call did not agree to all of my requests, they did agree to provide further information to me. I made it very clear on that call that Cisco needed the additional information in order to conduct its investigation.

I waited but never received the additional information that Kaifi promised to provide. Instead, on February 2, Mr. Bunt asked me to give him an update on when the production would be ready. We then had multiple back and forths and I specifically told you that "Cisco has not identified any information for which it needs T-Mobile's authorization to produce. Thus, obtaining such authorization is not the cause of any so called "delay" in production. Instead, I am still waiting on you and your team to provide the information Cisco requested during our meet and confer. Please provide that information to me."

That same day, I detailed in an email to Mr. Bunt my understanding of what had occurred during that meet and confer including identifying the additional information that Kaifi had promised to provide. I asked Mr. Bunt to "please let me know immediately if you believe I misunderstood Kaifi's positions on any of this." Mr. Bunt did not do so, and so I assumed that he agreed that my understanding of the call was correct.

It was not until yesterday that Kaifi finally provided some of the additional information I had requested. However, some of that information was not accessible when I attempted to access the link provided by Kaifi. I immediately let Mr. Bunt know but it still took several hours for Kaifi to fix the problem. By the time the issue was dealt with, it was late afternoon and I no longer had time to access and review the information yesterday.

That was only yesterday. Yet, today, you emailed me and a long list of others, claiming that Kaifi was working "very hard with Cisco" and trying to make it appear as if Cisco's failure to produce documents is somehow Cisco and T-Mobile's fault. Let me be clear: Cisco has not produced any documents to date because Kaifi's subpoena was overly broad and Kaifi delayed until yesterday providing ANY of the additional information requested by Cisco and ANY of the additional information it agreed almost three weeks ago to provide. And the information that Kaifi provided yesterday is not terribly helpful in limiting the burden of this investigation on Cisco. In fact, instead of narrowing its requests, according to yesterday's email, Kaifi apparently now is seeking information on additional products not identified in the subpoena.

Cisco will take Kaifi's additional and new requests under advisement. But I do not appreciate you threatening a motion to compel if Cisco does not immediately cave to your requests. The fact that Cisco has not provided any documents to date is entirely due to Kaifi's failure properly to limit its subpoena and Kaifi's delay in providing additional information to Cisco.

Marta

From: Sheasby, Jason < <u>JSheasby@irell.com</u>> Sent: Wednesday, February 10, 2021 7:46 AM

To: Marta Beckwith <marta@techsealaw.com>; Kremer, Paul J. <PKremer@gibsondunn.com>

Cc: Curtis, Nathan R. < NCurtis@gibsondunn.com; Kelsey Atkinson kelsey.atkinson@ltlattorneys.com; Dominguez,

Kate <KDominguez@gibsondunn.com>; Hershkowitz, Benjamin <BHershkowitz@gibsondunn.com>; Krevitt, Josh

<JKrevitt@gibsondunn.com>; ~Smith, Melissa <melissa@gillamsmithlaw.com>; Michael Song

<michael.song@ltlattorneys.com>; Enoch Liang <Enoch.Liang@ltlattorneys.com>; ~Bunt, Robert

<rcbunt@pbatyler.com>; ~Attaway, Deana <dattaway@pbatyler.com>; Matthew Hawkinson

<<u>mhawkinson@hycounsel.com</u>>; Steve Chang <<u>steve.chang@ltlattorneys.com</u>>; Dat Nguyen <<u>dat.nguyen@ltlattorneys.com</u>>; *** TMUS-Kaifi_C <<u>TMUS-Kaifi_C@gibsondunn.com</u>> Subject: Re: Kaifi v. T-Mobile:

Marta:

We have tried very hard to work with Cisco and T-Mobile on compromises but to date we have not received a single document from Cisco, nor a commitment to produce a single document. From the materials we shared with you it is clear that Cisco played an intimate role in the construction of T-Mobile's WiFi switching systems.

We also believe that the behavior of Cisco and T-Mobile with regard to this subpoena has been exceptional and out of the ordinary. As one example, your position that documents can be produced without T-Mobile's permission coupled with T-Mobile's refusal to give that permission as somehow premature. As another example, your demand that you will only respond to communications from one member of our team.

It seems apparent to us that Cisco has contractual duty to assist T Mobile in this litigation (which is common in this industry and which Cisco has never denied). This make Cisco's behavior even more out of the ordinary.

In a further effort to compromise we make the following proposal below. If you cannot commit to this proposal by Monday, with substantial completion of the production within two weeks there-after and complete production an additional two weeks there-after we will file a motion to compel with the Court:

We believe the subpoena of Cisco is proper. Below are some examples of the equipment Cisco has provided to T-Mobile that related to WiFi switching that have been derived from T-Mobile's production. Based on this it is clear that Cisco make extensive contributions to T-Mobile's wi-fi switching.

PGW

TMOBILE_KAIFI_00018023; ePDG VoWiFi, June 4, 2014 at Slide 2

ASR5000/ASR5500 (ASR5Ks)

T-Mobile GTP S2b interface on P-GW, MITG Feature Document, October 12, 2014. TMOBILE_KAIFI_00017822 at TMOBILE KAIFI 00017827.

* See, at p. 5 "The implementation of Sb2 shall allow subscribers to handover between WiFi and E-UTRAN (LTE) while retaining session continuity and mobile IP address."

Mobile Access Router

Cisco Mobile Access router used in TM "HotZone Mesh Network"/"Project Hotzone" for emergency services) (TMOBILE_KAIFI_00022158; TMOBILE_KAIFI_00021636)

Website states that it assists in seamless switching between cell and wifi networks:

 $\frac{https://www.cisco.com/en/US/docs/solutions/Enterprise/Mobility/emob30dg/MESH.html}{https://urldefense.proofpoint.com/v2/url?u=https-}\\$

3A www.cisco.com en US docs solutions Enterprise Mobility emob30dg MESH.html&d=DwMFaQ&c=euGZstcaTDll vimEN8b7jXrwqOf-v5A CdpgnVfiiMM&r=DMwim21dorS3nDgTyLZCFEUeJkMaPhridcsqGlVZi1A&m=BsEczViserMbP-sEuQvHW-N3VBLLQFJ-4a1qdRYJytM&s=zm98FE2tlm4e5Z0DCb02Ok5-

Fl6vZLP7VwyJ6eSrO9g&e=>><https://www.cisco.com/en/US/docs/solutions/Enterprise/Mobility/emob30dg/MESH.html https://urldefense.proofpoint.com/v2/url?u=https-

3A www.cisco.com en US docs solutions Enterprise Mobility emob30dg MESH.html&d=DwMFaQ&c=euGZstcaTDll vimEN8b7jXrwqOf-v5A CdpgnVfiiMM&r=DMwim21dorS3nDgTyLZCFEUeJkMaPhridcsqGlVZi1A&m=BsEczViserMbP-sEuQvHW-N3VBLLQFJ-4a1qdRYJytM&s=zm98FE2tlm4e5Z0DCb02Ok5-Fl6vZLP7VwyJ6eSrO9g&e=>>

Cisco PassPoint Products

Wifi Access Integration & Technology Development, Sept. 10, 2015 at Slide 13. KAIFI_TMOBILE_00022603 at KAIFI_TMOBILE_0022615.

Website states that it assists in seamless switching between cell and wifi networks.

https://www.cisco.com/c/en/us/td/docs/wireless/controller/technotes/7-

5/Hotspot 057.htmlhttps://urldefense.proofpoint.com/v2/url?u=https-

3A www.cisco.com c en us td docs wireless controller technotes 7-2D5 Hotspot-

5F057.html&d=DwMFaQ&c=euGZstcaTDllvimEN8b7jXrwqOf-

v5A CdpgnVfiiMM&r=DMwim21dorS3nDgTyLZCFEUeJkMaPhridcsqGlVZi1A&m=BsEczViserMbP-sEuQvHW-N3VBLLQFJ-4a1qdRYJytM&s=M67MT0sfijtWO dh TV NKiwe-

zWI4RizOKMtSb Kg0&e=>><https://www.cisco.com/c/en/us/td/docs/wireless/controller/technotes/7-

5/Hotspot 057.htmlhttps-

3A www.cisco.com_c_en_us_td_docs_wireless_controller_technotes_7-2D5_Hotspot-

5F057.html&d=DwMFaQ&c=euGZstcaTDllvimEN8b7jXrwgOf-

v5A_CdpgnVfiiMM&r=DMwim21dorS3nDgTyLZCFEUeJkMaPhridcsqGIVZi1A&m=BsEczViserMbP-sEuQvHW-N3VBLLQFJ-4a1qdRYJytM&s=M67MT0sfijtWO_dh_TV_NKiwe-zWI4RizOKMtSb_Kg0&e=>>

ANDSF (Hotspot 2.0)

Targeted date for ANSDF launch Q3/Q4 2016. Wi-Fi Access Integration strategy & Technology Development, August 26th, 2015, at Slide 18, TMOBILE_KAIFI_00022568 at TMOBILE_KAIFI_00022585.

AAA - CPAR System

T-Mobile Cisco Prime Access Registrar VoWiFi Solution Low Level Design, v3.15, April 13, 2018 at p. 21, TMOBILE_KAIFI_00034821 at TMOBILE_KAIFI_00034841, "5.4, EPC Integration requirement vendor details"

In addition, we have identified a 2018 Cisco presentation which we have provided to you entitled "T-Mobile Cisco Prime Access Registrar VoWiFi Solution Low Level Design" which provides extensive detail regarding the equipment, services and software provided by Cisco to support WiFi switching at T-Mobile.

As an initial step, we would like Cisco to provide documents sufficient to fully describe the operation and specifications of the equipment provided to T-Mobile that is involved in its WiFi switching systems, which the above documents indicate CCISCO was intimately involved with. It is our hope that this production will obviate the need for source code, but we cannot be sure until we look at the documents.

We also believe it is reasonable to seek production of the following:

- 1. All presentations and communications shared with T-Mobile or referencing T-Mobile that also reference KAIFI, Dong-Ho Cho, US Patent No. 6,922,728 or any application or foreign counterpart of the patent in suit.
- 2. All presentations shared with T-Mobile regarding the benefits and operations of the WiFi switching systems developed with and for T-Mobile.
- 3. All agreements with T-Mobile relating to the foregoing.

As part of this, we would also like T-Mobile to prepare a privilege log.

Thanks

JS

From: Jason Sheasby <JSheasby@irell.com<mailto:JSheasby@irell.com>>>

Date: Tuesday, February 2, 2021 at 9:56 AM

To: 'Marta Beckwith' <marta@techsealaw.com<mailto:marta@techsealaw.com>>, "Kremer, Paul J."

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Cc: "Curtis, Nathan R." < NCurtis@gibsondunn.com < mailto: NCurtis@gibsondunn.com >>, Kelsey Atkinson

<kelsey.atkinson@ltlattorneys.com<mailto:kelsey.atkinson@ltlattorneys.com>>, "Dominguez, Kate"

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Subject: RE: Kaifi v. T-Mobile:

Dear Marta:

Your email is inaccurate. I understand that you have rejected our proposal in my previous email.

Let's try an alternative. In T-Mobile's production is a 2018 presentation by CISCO entitled "T-Mobile Cisco Prime Access Registrar VoWiFi Solution Low Level Design." Can you provide technical document sufficient to fully describe all of the elements of this design provided by CISCO?

Separately, I don't think my communications have been either "unpleasant or unprofessional" and I apologize if it has come across that way. But having said that, we expect CISCO to meet and confer with all KAIFI attorneys, not just a single KAIFI attorney you chose. There are times when Mr. Bunt will not be available and it is most efficient for us all to pitch in to try to resolve this subpoena without motion practice.

Thanks

JS

From: Marta Beckwith < <u>marta@techsealaw.com</u>< <u>marta@techsealaw.com</u>>>

Sent: Tuesday, February 2, 2021 9:38 AM

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Subject: RE: Kaifi v. T-Mobile:

Jason –I requested additional information from Kaifi during the meet and confer and let you know that Cisco needed such information in order for Cisco to undertake a reasonable investigation. Kaifi did agree on that call to provide some further information but has not yet done so. Investigating at this stage in response to Kaifi's overly broad requests in the subpoena would be unduly burdensome on Cisco and those requests, and your request below, are disproportionate to the needs of the case. Cisco stands on its objections and is waiting for Kaifi to provide it sufficient information to narrow the requests to what is reasonably relevant and not unduly burdensome to search for and produce.

Furthermore, you did not serve that subpoena and your behavior has been unpleasant and unprofessional. Mr. Bunt issued the subpoena to Cisco and from now on, I expect Mr. Bunt, and only Mr. Bunt, will follow up with me about it.

Marta

From: Sheasby, Jason

<JSheasby@irell.com<mailto:JSheasby@irell.com<mailto:JSheasby@irell.com%3cmailto:JSheasby@irell.com>>>>

Sent: Tuesday, February 2, 2021 9:09 AM

To: Marta Beckwith

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Cc: Curtis, Nathan R.

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<<u>dat.nguyen@ltlattorneys.com</u><<u>mailto:dat.nguyen@ltlattorneys.com</u><<u>mailto:dat.nguyen@ltlattorneys.com</u>%3cmailto:dat.nguyen@ltlattorneys.com</mailto:TMUS-Kaifi_C</mailto:dat.nguyen@ltlattorneys.com</mailto:TMUS-Kaifi_C</mailto:dat.nguyen@ltlattorneys.com

<u>Kaifi_C@gibsondunn.com<mailto:TMUS-Kaifi_C@gibsondunn.com%3cmailto:TMUS-Kaifi_C@gibsondunn.com</u>>>>

Subject: RE: Kaifi v. T-Mobile:

Marta:

The combination of your email and T-Mobile's email gives us some pause. You are not waiting for anything from us, we are waiting for you to get back to us.

Let me, however, propose the following:

Within one week provide us with a listing and short description of the equipment and software and services your client has provided to T-Mobile. With this we can then identify what detailed technical information we need, including source, code.

Please confirm agreement by the end of the day.

Thanks

JS

From: Marta Beckwith

<marta@techsealaw.com<mailto:marta@techsealaw.com%3cmailto:marta@t

Sent: Tuesday, February 2, 2021 8:46 AM

To: Sheasby, Jason

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Cc: Curtis, Nathan R.

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Subject: RE: Kaifi v. T-Mobile:

Jason – At this stage, Cisco has not identified any information for which it needs T-Mobile's authorization to produce. Thus, obtaining such authorization is not the cause of any so called "delay" in production. Instead, I am still waiting on you and your team to provide the information Cisco requested during our meet and confer. Please provide that information to me.

Marta

From: Sheasby, Jason

<JSheasby@irell.com<mailto:JSheasby@irell.com<msilto:JSheasby@irell.com</p>>>>

Sent: Tuesday, February 2, 2021 7:14 AM

To: Kremer, Paul J.

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Cc: Marta Beckwith

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Enoch.Liang@ltlattorneys.com>>>; ~Bunt, Robert

<<u>rcbunt@pbatyler.com<mailto:rcbunt@pbatyler.com<mailto:rcbunt@pbatyler.com%3cmailto:rcbunt@pbatyler.com>></u>
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<u>at.nguyen@ltlattorneys.com</u>>>>; *** TMUS-Kaifi_C < <u>TMUS-Kaifi_C@gibsondunn.com</u>< <u>mailto:TMUS-Kaifi_C@gibsondunn.com</u>

Kaifi_C@gibsondunn.com
C@gibsondunn.com

Subject: Re: Kaifi v. T-Mobile:

Paul.

Delaying Cisco's production by refusing to grant them permission to release T-mobile confidential information is an abuse of the discovery process. We strongly urge you to reconsider.

Best

JS

On Feb 2, 2021, at 7:00 AM, Kremer, Paul J.

< <a href="https://example.com/substitution-new-mailto:PKremer@gibsondunn.com/substitution-new-mailto:PKremer@gibsondun

Jason,

T-Mobile is not in a position to determine what documents, if any, Cisco intends to produce. If and when we receive a request to consent to a production, we will promptly consider it.

Best, Paul J. Kremer (he / him / his)

GIBSON DUNN

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From: Sheasby, Jason

<JSheasby@irell.com<mailto:JSheasby@irell.com<mailto:JSheasby@irell.com%3cmailto:JSheasby@irell.com>>>

Sent: Thursday, January 21, 2021 10:15 PM

To: Marta Beckwith

<marta@techsealaw.com<mailto:marta@techsealaw.com%3cmailto:marta@t

Cc: Curtis, Nathan R.

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Subject: Re: Kaifi v. T-Mobile:

[External Email]

Marta.

By this email we are asking t-mobile permission to produce any of their confidential information responsive to our subpoena.

They can respond and then this can be removed as a basis for objection.

Best JS

On Jan 21, 2021, at 6:12 PM, Marta Beckwith

<marta@techsealaw.com<mailto:marta@techsealaw.com<mailto:marta@techsealaw.com%3cmailto:marta@

Jason, your message is premature. Cisco is not currently in position to produce anything. We are still investigating in response to the subpoena. Once we have located documents that are responsive and not objectionable, if we need Tmobile's authorization we will seek it. What I mentioned on the call was what I expected we might find and do, not what Cisco knows right now it has or what it has determined it will need to do.

Marta

From: Sheasby, Jason

<JSheasby@irell.com<mailto:JSheasby@irell.com<3cmailto:JSheasby@irell.com<mailto:JSheasby@irell.com%3cmailto:JSheasby@irell.com%3cmailto:JSheasby@irell.com%3cmailto:JSheasby@irell.com</p>

Sent: Thursday, January 21, 2021 4:59:10 PM

To: 'Curtis, Nathan R.'

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Cc: Michael Song

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Kaifi_C@gibsondunn.com%3cmailto:TMUS-Kaifi_C@gibsondunn.com>>>>

Subject: Kaifi v. T-Mobile:

All:

Cisco's counsel needs permission to produce T-Mobile confidential information. T-Mobile counsel, please provide this permission in writing via responding to this email.
Thanks
JS

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